

## Exhibit 15

1                   IN THE UNITED STATES COURT  
2                   NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

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5                   ~ ~ ~ ~ ~  
6   IN RE:   NATIONAL PRESCRIPTION       MDL NO. 2804  
7   OPIATE LITIGATION

8                   Case no.  
9                   17-mdl-284  
10                  Judge Dan Polster

11  
12   This document relates to:

13   The County of Summit, Ohio, et al.,

14       v.

15   Purdue Pharma L.P., et al.,

16   Case No. 1:18-OP-45090 (N.D. Ohio)

17                   ~ ~ ~ ~ ~  
18                  Continued deposition of  
19                  PATRICK LEONARD, VOLUME II

20                  PORTIONS OF THE TRANSCRIPT ARE DESIGNATED

21                  CONFIDENTIAL

22                  March 27, 2019

23                  11:03 a.m.

24                  Taken at:

25                  Ulmer & Berne

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## TRANSCRIPT INDEX

APPEARANCES: . . . . .	111
INDEX OF EXHIBITS . . . . .	115
EXAMINATION OF PATRICK LEONARD	
By Mr. Roman. . . . .	117
By Mr. Winkelman. . . . .	176
By Mr. Moylan. . . . .	245
By Mr. Goldstein. . . . .	290
By Mr. Moylan. . . . .	342
REPORTER'S CERTIFICATE. . . . .	
	346
EXHIBIT CUSTODY	
EXHIBITS RETAINED BY COURT REPORTER.	

1 annual basis how much the City of Akron or the  
2 Akron Police Department receives pursuant to  
3 this asset forfeiture sharing agreements?

4 A. No, I do not.

5 Q. Do you know where these DAG forms  
6 are maintained?

7 A. No, sir, I do not.

8 Q. Do you personally maintain copies  
9 of the DAG forms that you completed?

10 A. I do not.

11 Q. Where do you send them?

12 A. To one of the administrative staff  
13 at the Cleveland Drug Enforcement  
14 Administration office to be processed.

15 Q. Do you know who in particular?

16 A. Ashley -- for the life of me, I  
17 can't think of her last name right now --  
18 Williams.

19 Q. Do you know what Ms. Williams does  
20 with them?

21 A. No, sir, I don't.

22 Q. Now, the last time we talked, you  
23 testified that there was no opioid crisis in  
24 Akron before 2012; do you remember that  
25 testimony?

1 A. Yes, sir.

2 Q. And is that still your testimony?

3 MR. LEDLIE: Object to the form.

4 Misstates his testimony.

5 A. Yes, sir, I still believe that the  
6 epidemic did not hit prior to 2012.

7 Q. Is it your view that there is now  
8 an opioid crisis or epidemic in Akron?

9 A. Yes, sir, there is.

10 Q. How to you describe that crisis or  
11 epidemic?

12 A. An overwhelming medical problem in  
13 the opioids in our geographical area of  
14 Northeastern Ohio.

15 Q. What are the elements of that  
16 overwhelming medical problem?

17 A. The amount of time and money spent  
18 by the fire department, the police department,  
19 the emergency rooms, the coroner's office  
20 investigating and following up on overdoses and  
21 overdose deaths within our region.

22 Q. And you believe that this epidemic  
23 or crisis -- do you prefer one of those two  
24 terms?

25 A. It doesn't matter to me.

1                   Q.     Okay. You believe this epidemic or  
2     crisis drug began sometimes between 2012 and  
3     2019, correct?

4                   A.     The crisis, I do have an opinion.  
5     The crisis has been ongoing throughout the  
6     2000s. It continued to evolve. I don't  
7     believe it turned into an epidemic until after  
8     2012, but there has been a continual opioid  
9     crisis in the geographical area of Summit and  
10    Northeastern Ohio.

11                  Q.     When do you believe it became an  
12    epidemic in the Akron area?

13                  A.     I think that's one of those  
14    questions that, based on my training,  
15    experience in the field, and doing my job, that  
16    those are information I've learned as a TFO and  
17    an Akron police officer.

18                  I have a hard time disseminating  
19    what I'm authorized to say legally.

20                  MR. BENNETT: So I'll remind the  
21    witness that he is not authorized to give  
22    personal opinions regarding nonpublic facts or  
23    information you acquired as part of the  
24    performance of your task force officer duties.  
25    Information you learned outside of the cases

1       you investigated, as a TFO, then you may  
2       answer.

3           A.       And therein lies the problem. I  
4       believe that most of what I learned as a TFO  
5       would give me the idea of what years that  
6       epidemic started. So unfortunately, I'm not  
7       authorized to answer that.

8           Q.       Let me ask a different question.  
9       What changed, what was it that was not an  
10       epidemic before and that became an epidemic,  
11       what was the difference, was it just a matter  
12       of magnitude, was there an event?

13          A.       I don't think there was one  
14       specific event. I think it was a continued  
15       growth of the crisis that turned into an  
16       epidemic, whether it is sheer volume of  
17       victims, of individuals, that overwhelmed all  
18       the resources we had in the area.

19          Q.       And your view is that sometime  
20       between 2012 and 2019, the sheer volume took  
21       an -- increased, correct?

22                    MR. LEDLIE: Object to the form.

23          A.       Yes, I believe that's a fair  
24       statement.

25          Q.       Now, originally, you said you